

## Mertzel Law PLLC

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### VIA ECF

March 18, 2025

Honorable Arun Subramanian  
United States District Judge  
Southern District of New York  
500 Pearl Street, Courtroom 15A  
New York, NY 10007

**Re: Sanders Collection Inc. v. dBest products Inc.; SDNY 24-cv-10045-AS**

Dear Judge Subramanian:

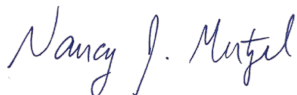
I am local counsel for defendant dbest products Inc. ("dbest") in the above-referenced action. Ehab Samuel of Orbit IP, LLP is lead counsel.

We write to request that the Court (1) grant a two-week extension for dbest to respond to the Complaint, and (2) adjourn the initial pretrial conference to a date to be set by the Court. Plaintiff's counsel consented to these requests in an email to the undersigned.

Based on the Affidavit of Service (ECF 8), dbest's time to respond to the Complaint is currently March 21, 2025. An initial pre-trial conference is currently scheduled for April 3, 2025 at 3:00 p.m. The extensions are requested to enable Defendant to gather information needed for its response and to facilitate a meaningful initial conference. This is the first request for the relief sought herein.

For the foregoing reasons, dbest requests that the Court extend its deadline to respond to the Complaint to and including April 4, 2025 and adjourn the initial pretrial conference to a date to be set by the Court.

Respectfully submitted,



Nancy J. Mertzel

cc: Counsel of Record (via ECF)  
Ehab M. Samuel, Esq. (via email) (pro hac vice to be filed)